

**UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF VIRGINIA  
ALEXANDRIA DIVISION**

---

KAYLA AZPEITIA,  
on behalf of herself and all others similarly situated,

Plaintiff,

v.

CASE NO. 1:23-cv-01742-DJN

EMPLOYMENT ADVOCATES GROUP LLC,

Defendant.

---

**JOINT MOTION FOR APPROVAL OF  
SETTLEMENT AGREEMENT AND DISMISSAL WITH PREJUDICE**

---

Plaintiff Kayla Azpeitia (“Plaintiff”) and Defendant Employment Advocates Group LLC (“Defendant”) (collectively, the “Parties”), jointly file this Joint Motion for Approval of Settlement Agreement and Dismissal With Prejudice (“Motion”), requesting that the Court (1) approve the Parties’ Settlement Agreement, filed as Exhibit 1 to this Motion, and (2) dismiss the Action with Prejudice, while retaining jurisdiction to enforce the terms of the settlement pursuant to *Kokkonen v. Guardian Life Insurance Co. of America*, 511 U.S. 375 (1994). The grounds for this Motion are more fully set forth in the accompanying Memorandum in Support. The Parties agree that the terms set forth in the Settlement Agreement are fair and reasonable and that no hearing before the Court is needed or requested.

Respectfully submitted,

*Counsel for Plaintiff Kayla Azpeitia:*

/s/Timothy Coffield

Timothy Coffield (VSB No.  
83430)  
Coffield PLC  
106-F Melbourne Park Circle  
Charlottesville, VA 22901  
P: (434) 218-3133  
F: (434) 321-1636  
tc@coffieldlaw.com

/s/Matthew Sutter

Matthew T. Sutter, Esq., VSB  
66741  
Sutter & Terpak, PLLC  
7540 Little River Turnpike,  
Suite A  
Annandale, VA 22003  
Telephone: (703) 256-1800  
Facsimile: (703) 991-6116  
matt@sutterandterpak.com

*Counsel for Defendant Employment Advocates Group LLC:*

/s/Micah E. Ticath

Micah E. Ticatch (VSB 83351)  
IslerDare, P.C.  
1945 Old Gallows Rd., Ste 650  
Vienna, Va. 22182  
mticatch@islerdare.com  
(703) 663-1308

**CERTIFICATE**

I HEREBY CERTIFY that on April 18, 2024 the foregoing was filed using the Court's ECF system which will send electronic notice of the same to all counsel of record.

/s/ Timothy Coffield